

KAZEROUNI LAW GROUP, APC
NEVADA, CALIFORNIA

Michael Kind, Esq.
NV Bar No. 13903
KAZEROUNI LAW GROUP, APC
7854 W. Sahara Avenue
Las Vegas, NV 89117
Phone: (800) 400-6808 x7
FAX: (800) 520-5523
mkind@kazlg.com

David H. Krieger, Esq.
NV Bar No. 9086
HAINES & KRIEGER, LLC
8985 S. Eastern Avenue, Suite 350
Henderson, Nevada 89123
Phone: (702) 880-5554
FAX: (702) 385-5518
dkrieger@hainesandkrieger.com

*Attorneys for Plaintiff,
Paris I. Montana*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

| | |
|--|---|
| <p>Paris I. Montana,</p> <p>Plaintiff,</p> <p>v.</p> <p>Credit Control Corporation and Experian Information Solutions, Inc.</p> <p>Defendants.</p> | <p>Case No.: 2:15-cv-01064-JAD-VCF</p> <p>INTERIM STATUS REPORT PURSUANT TO LOCAL RULE 26- 3</p> |
|--|---|

1 Plaintiff Paris I. Montana (“Plaintiff”) and Defendant Experian Information
2 Solutions, Inc. (“Experian” or “Defendant”) (jointly as the “Parties”) through their
3 respective counsel, hereby submit this Interim Status Report Pursuant to Local Rule
4 26-3.

5 **1. Estimated Time For Trial:**

6 Plaintiff’s position: Plaintiff estimates 2-3 days.

7 Defendant’s Position: Defendant estimates 2–3 days.

8 **2. Proposed Trial Dates:**

9 Plaintiff’s position: Plaintiff is generally available for trial in July, August or
10 December 2016;

11 Defendant’s Position: Defendant is generally available for trial after
12 December 2016.

13 **3. Whether trial will be eliminated or affected by substantive motions:**

14 No substantive motions are pending at this time. The Parties anticipate filing
15 motions for summary judgment that may affect or eliminate the need for trial.

16 **4. Request for Extension of Discovery:**

17 The close of discovery is currently set for May 11, 2016. The parties
18 respectfully request an additional 45 days to continue settlement discussions and, if
19 necessary, to schedule depositions.

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 The Parties propose June 27, 2016 as the new cut off.
2

3 DATED this 6th day of April 2016.
4

5 **Kazerouni Law Group, APC**

6 By: /s/ Michael Kind
7 Michael Kind, Esq.
8 7854 W. Sahara Avenue
9 Las Vegas, NV 89117
Attorneys for Plaintiff

10 **Snell & Wilmer LLP**
11

12 By: /s/ Charles Gianelloni
13 Bob L. Olson, Esq.
14 3883 Howard Hughes Parkway, Suite 1100
15 Las Vegas, NV 89169
Attorney for Defendant Experian Information Solutions, Inc.
16
17
18
19
20
21
22
23
24
25
26
27
28

KAZEROUNI LAW GROUP, APC
NEVADA, CALIFORNIA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on March 6, 2016, the foregoing INTERIM STATUS REPORT PURSUANT TO LOCAL RULE 26-3 was served via CM/ECF to all parties appearing in this case.

KAZEROUNI LAW GROUP, APC

By: /s/ Michael Kind
Michael Kind
7854 W. Sahara Avenue
Las Vegas, NV 89117

KAZEROUNI LAW GROUP, APC
NEVADA, CALIFORNIA